

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
ROANOKE DIVISION

WINFORD DALLAS JONES,) Civil Action No.
) 7:06-CV-00547
 Plaintiff,)
)
 v.)
)
)
 C.H. ROBINSON WORLDWIDE, INC.;)
 and C.H. ROBINSON COMPANY; and)
 C.H. ROBINSON COMPANY, INC.;)
 and C.H. ROBINSON COMPANY,)
 L.P.; and C.H. ROBINSON)
 INTERNATIONAL, INC.; and C.H.)
 ROBINSON OPERATING COMPANY,)
 L.P.; and C.H. ROBINSON)
 TRANSPORTATION COMPANY, INC.,)
)
)
 Defendants.)

VOLUME II, pages 105-214
30(b)(6) DEPOSITION OF: Bruce W. Johnson
TAKEN AT: C.H. Robinson Worldwide, Incorporated
14701 Charlson Road
Eden Prairie, Minnesota

DATE: March 13, 2008

COMMENCING AT: 9:06 a.m.

Reported by: Patrick J. Mahon
Registered Merit Reporter
Certified Realtime Reporter
Job No. 4932



1 APPEARANCES:

2 For the Plaintiff:

3 Timothy E. Kirtner
4 Gilmer, Sadler, Ingram, Sutherland & Hutton, L.L.P.
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8 For the Defendants:

9 Paul C. Kuhnel
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13 Roanoke, Virginia 24016
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1 Q. Is there a particular reason that as of today 75
2 percent of C.H. Robinson's contract carriers consist of
3 small carriers?

4 A. I'm sure there is, but I'd probably be somewhat
5 speculating as to why.

6 Q. Well, subject to Mr. Kuhnel's objection, which
7 he's about to make, I'm going to ask you to go ahead and
8 answer that question.

9 MR. KUHNEL: Well, I'll object to the form
10 of the question to the extent it calls for speculation.
11 You can answer, if you're able to.

12 A. A lot of those things we talked about as to what
13 we market, I mean, that's important, those things are
14 important to small carriers.

15 BY MR. KIRTNER:

16 Q. Okay. Cash flow issues are important to small
17 carriers, correct?

18 A. For the most part, correct.

19 Q. And working with C.H. Robinson because of Quick
20 Pay and T-Chek helps small carriers to keep the wheels
21 rolling; is that correct?

22 A. Correct.

23 Q. Do you have any sense of -- strike that.

24 Do you have any ability to break that down any more
25 narrowly? Specifically, what about carriers with less

1 than 10 tractors, do you know what those numbers look
2 like?

3 A. I don't know.

4 Q. Could you estimate that?

5 A. I wouldn't want to without further research.

6 Q. Okay. Do you have the ability to research that?

7 A. Yes.

8 Q. Understanding that you don't know how many of the
9 carriers who are in C.H. Robinson's contract carrier
10 program have less than 10 tractors, would it be your
11 experience that carriers who have fewer than 10 tractors
12 are more frequently in need of the Quick Pay and T-Chek
13 services?

14 A. Yes.

15 Q. Do you know how many tractors AKJ Enterprises
16 had?

17 A. Not off the top of my head.

18 MR. KIRTNER: Can we get this document
19 marked as Exhibit 12?

20 (Ex. 12 was marked for identification.)

21 BY MR. KIRTNER:

22 Q. When we were here the last time, I think where we
23 left off is, you were beginning to talk something about
24 SafeStat and how C.H. Robinson is dealing with SafeStat.

25 A. Correct.